

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STEELWORKERS OF AMERICA,)	
AFL-CIO/CLC,)	
)	
Plaintiff,)	Civil Action No. 04-12489
)	
v.)	
)	
Pliant Corporation,)	
)	
Defendant.)	
)	

**PLAINTIFF'S CERTIFICATION OF COMPLIANCE
WITH LOCAL RULE 16.1(D)(3)**

The United Steelworkers of America, AFL-CIO/CLC and its attorney hereby affirm that we have conferred in accordance with Local Rule 16.1(D)(3) and discussed the potential costs of conducting this litigation and alternative means of dispute resolution.

s/ Albert Polk
On behalf of United Steelworkers
Of America, AFL-CIO/CLC, Plaintiff

Dated: May 16, 2005

s/ Nicole Horberg Decter
Warren H. Pyle, BBO #408400
Nicole Horberg Decter, BBO #658268
Pyle, Rome, Lichten, Ehrenberg, and
Liss-Riordan, P.C.
18 Tremont Street, Suite 500
Boston, MA 02108
(617) 367-7200

Dated: March 16, 2005

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2005, I caused a copy of this document to be served by first-class mail on all counsel of record.

s/ Nicole Horberg Decter
Nicole Horberg Decter, Esq.